

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, NORTHERN DIVISION**

<b>EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>and</b>	:	
	:	<b>CASE NO.: WDQ-02-CV-648</b>
<b>KATHY KOCH,</b>	:	
	:	
<b>Intervenor/Plaintiff,</b>	:	<b>JURY DEMANDED</b>
	:	
<b>v.</b>	:	
	:	
<b>LA WEIGHT LOSS CENTERS, INC.,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

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**NOTICE OF DEPOSITION**


Please take notice that, pursuant to Federal Rule of Civil Procedure 30(b)(6), defendant LA Weight Loss Centers, Inc. ("LAWL") will take the testimony of one or more persons designated by plaintiff United States Equal Employment Opportunity Commission ("EEOC") to testify about the matters listed below. The deposition will be held on March 24, 2006, at the offices of Shawe & Rosenthal, LLP, 20 S. Charles Street, Baltimore, MD, and will commence at 10:00 a.m. The deposition will be taken before a notary or other person authorized to administer oaths, and will continue from day to day until complete. The deposition will be transcribed by a court reporter.

**AREAS OF INQUIRY**

1. Facts regarding class claimants in this litigation, including:
  - (a) The date(s) on which each claimant applied for employment with LAWL;

- (b) The method(s) by which each claimant applied for employment;
  - (c) The position(s) for which each claimant applied;
  - (d) The availability of the position(s) for which each claimant applied at the time of application;
  - (e) The person(s) involved in pre-screening, interviewing or otherwise communicating with each claimant about their application;
  - (f) The employment background each claimant had qualifying them for the position(s) they sought with LAWL;
  - (g) The person(s) who received an offer of employment from LAWL for the position(s) to which each claimant applied and their employment background and qualifications.
  - (h) EEOC's contention that each claimant was equally qualified for the position(s) to which he applied as the person(s) selected to fill the position(s).
  - (i) EEOC's contention that each claimant was not offered employment with LAWL because of his gender and that LAWL's reason(s) for why the claimant was not selected is pretext for discrimination.
2. Statements, including without limitation declarations and affidavits, made or signed by any current or former employee or agent of LAWL that EEOC contends or would contend is evidence of discrimination against men on the basis of gender.
3. Former employees with whom EEOC has spoken and/or interviewed and/or received statements, including declarations and affidavits.
4. LAWL's acts, omissions, practices or policies that EEOC asserts constitute actionable discrimination against men on the basis of their gender in violation of Title VII.
5. LAWL's acts, omissions, practices or policies that EEOC asserts are evidence of discrimination against men on the basis of their gender in violation of Title VII.
6. For each year 1997 through the present, the facts underlying EEOC's contention that LAWL's hiring policies and practices are discriminatory.

7. The pages, portions, sections or paragraphs of LAWL's written employment guides, handbooks, policies, pre-screen forms, interview guides and/or other hiring-related documents that discriminate or have the effect of discriminating on the basis of gender. The written materials subject to this Area of Inquiry include all written employment guides, handbooks, policies, pre-screen forms, interview guides and/or other hiring-related documents created, adopted or used by LAWL for each year 1997 through the present.



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Dated: March 13, 2006

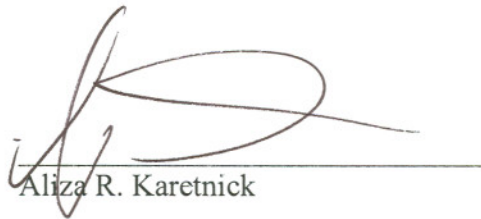
**Attorneys for Defendant LA Weight Loss Centers, Inc.**

**CERTIFICATE OF SERVICE**

I, Aliza R. Karetnick, hereby certify that I caused a true and correct copy of the foregoing Notice of Deposition to be served via fax and first-class mail, postage pre-paid, upon the following:

Ronald L. Phillips, Esquire  
U.S. Equal Employment Opportunity Commission  
Baltimore District Office  
10 South Howard Street, 3rd Floor  
Baltimore, MD 21201

Attorney for Plaintiff EEOC



Aliza R. Karetnick

Dated: March 13, 2006